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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE ELECTRONIC BOOKS ANTITRUST
LITIGATION

No. 11-md-02293 (DLC)

This Document Relates to:

ECF Case

ALL ACTIONS

**STIPULATION TO EXTEND TIME TO RESPOND TO
CONSOLIDATED AMENDED CLASS ACTION COMPLAINT**

WHEREAS, Hachette Book Group, Inc., Hachette Digital, Inc., Hachette Livre SA, HarperCollins Publishers, Inc., Simon & Schuster, Inc., and Simon & Schuster Digital Sales, Inc. (the "Settling Defendants") have been operating under a stay ordered by the Court;

WHEREAS, the stay expired on August 10, 2012, and the Settling Defendants are now subject to an obligation to respond to the Consolidated Amended Class Action Complaint (the "Complaint") in *In re Electronic Books Antitrust Litigation*, MDL Docket No. 2293;

WHEREAS, the Settling Defendants have executed *parens patriae* settlement agreements with 49 states, 5 territories and the District of Columbia;

WHEREAS, the Settling Defendants have been focused on their *parens patriae* settlement, which will be submitted for preliminary approval by August 29, 2012, and desire additional time to prepare responses to the Complaint;

WHEREAS, Class Counsel has consented to a response date of September 14, 2012, which will not interfere with any other scheduled dates in this Action;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and the Settling Defendants, subject to the approval of the Court, as follows:

Settling Defendants' time to answer, move or otherwise respond to the Complaint is hereby extended to September 14, 2012.

Dated: August 28, 2012

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So ordered.

James B.

Sept. 4, 2012

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*Attorneys for Defendants Simon & Schuster, Inc. and
Simon & Schuster Digital Sales, Inc.*

SO ORDERED, at New York, N.Y.,

August ___, 2012

Hon. DENISE COTE
United States District Judge

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